

**DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

JAMES M. MCNAMARA,

Plaintiff,

v.

HESS CORPORATION, et al.,

Defendants.

CASE NO. 1:20-cv-060

JURY TRIAL DEMANDED

**JOINT STIPULATION FOR EXPEDITED BRIEFING SCHEDULE**

COME NOW Plaintiff James M. McNamara and Defendants Hess Corporation and Hess Oil New York Corp., as successor by merger to Hess Oil Virgin Islands Corp., (“Defendants”), through undersigned counsel; and

WHEREAS subsequent to a Local Rule 37.1 conference the parties are unable to reach agreement on the scope of certain depositions related to jurisdictional discovery; and

WHEREAS, the Plaintiff intends to compel certain depositions and Defendants intend to seek a protective order; and

WHEREAS, the parties agree to an expedited briefing schedule with respect to the contemplated motions:

NOW, THEREFORE, it is hereby stipulated and agreed that:

1. The parties shall file their respective motions on or before September 3, 2021;
2. Responses are due September 8, 2021; and
3. Replies are due September 10, 2021.

Respectfully submitted,

**Beckstedt & Kuczynski LLP**

*Attorneys for Defendants Hess and HONYC*

2162 Church Street

Christiansted, VI 00820

Tel: (340) 719-8086 / Fax: (800) 886-6831

DATED: September 1, 2021

By: s/ Carl A. Beckstedt III  
Carl A. Beckstedt III, Esq.  
VI Bar No. 684  
[carl@beckstedtlaw.com](mailto:carl@beckstedtlaw.com)

**Wilson Elser Moskowitz**

**Edelman & Dicker LLP**

*Attorneys for Defendants Hess and HONYC*

200 Campus Drive

Florham Park, NJ 07932-0668

Tel: (973) 624-0800 / Fax: (973) 624-0808

DATED: September 1, 2021

By: s/ Carolyn F. O'Connor  
Carolyn F. O'Connor, Esq.  
[carolyn.oconnor@wilsonelser.com](mailto:carolyn.oconnor@wilsonelser.com)  
VI Bar R2100

DATED: September 1, 2021

By: s/ Joseph T. Hanlon  
Joseph T. Hanlon, Esq.  
[joseph.hanlon@wilsonelser.com](mailto:joseph.hanlon@wilsonelser.com)  
VI Bar R2099

**Burns Charest LLP**

*Attorneys for the Plaintiff*

365 Canal Street, Ste. 1170

New Orleans, LA 70130

DATED: September 1, 2021

By: s/ Korey A. Nelson  
Korey A. Nelson, Esq.  
VI Bar 2012  
[knelson@burnscharest.com](mailto:knelson@burnscharest.com)

DATED: September 1, 2021

By: s/ C. Jacob Gower  
C. Jacob Gower, Esq.  
VI Bar R2103  
[jgower@burnscharest.com](mailto:jgower@burnscharest.com)

DATED: September 1, 2021

By: s/ Warren T. Burns  
Warren T. Burns, Esq.  
VI Bar 2004  
[wburns@burnscharest.com](mailto:wburns@burnscharest.com)

**The Pate Law Firm**  
*Attorneys for the Plaintiff*  
PO Box 370  
Christiansted, VI 00821  
Tel: 340-777-5270

DATED: September 1, 2021

By: s/ J. Russell B. Pate  
J. Russell B. Pate, Esq.  
V.I. Bar 1124  
[Pate@SunLawVI.com](mailto:Pate@SunLawVI.com)